

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING
**OFFENSE CHARGED**
 18 USC sec. 1546(a)-False  
 Statement on an Immigration  
 Document; 18 U.S.C. sec 1001-  
 False Statement to U.S.; 18 U.S.C.  
 sec. 371-Conspiracy

☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony
**PENALTY:**
 18 U.S.C. 1546(a): 10 years; \$250,000 fine; 3 years  
 supervised release; \$100 special assessment  
 18 U.S.C. 1001 and 371: 5 years; \$250,000 fine; 3 years  
 supervised release; \$100 special assessment
**PROCEEDING**
 Name of Complainant Agency, or Person (& Title, if any)  
 ICE

☐ person is awaiting trial in another Federal or State  
 Court, give name of court

☐ this person/proceeding is transferred from another  
 district per (circle one) FRCrP 20, 21 or 40. Show  
 District

☐ this is a reprosecution of  
 charges previously dismissed  
 which were dismissed on  
 motion of:

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a  
 pending case involving this same  
 defendant

☐ prior proceedings or appearance(s)  
 before U.S. Magistrate regarding  
 this defendant were recorded under
SHOW  
DOCKET NO.MAGISTRATE  
CASE NO.
 Name and Office of Person  
 Furnishing Information on  
 THIS FORM
**SCOTT N. SCHOOLS**
☒ U.S. Att'y ☐ Other U.S. Agency

 Name of Asst. U.S. Att'y  
 (if assigned)

Allison Marston Danner

 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA
**DEFENDANT - U.S.****DORIS AKUYOMA ANYANWU**

DISTRICT COURT NUMBER

**CR 07 0677****DEFENDANT****IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons  
 was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of Institution

 Has detainer  
 been filed?

☐ Yes  
☐ No

 If "Yes"  
 give date  
 filed
**DATE OF  
ARREST**

Month/Day/Year

Or... If Arresting Agency &amp; Warrant were not

**DATE TRANSFERRED  
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted
**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**
☐ SUMMONS ☐ NO PROCESS\* ☒ WARRANT Bail Amount: no bail

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 \*Where defendant previously apprehended on complaint, no new summons  
 or warrant needed, since Magistrate has scheduled arraignment

Date/Time: \_\_\_\_\_

Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

AO 257 (Rev. 6/78)

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT  
☐ SUPERSEDING**OFFENSE CHARGED**18 USC sec. 1546(a)-False  
Statement on an Immigration  
Document; 18 U.S.C. sec.  
371-Conspiracy to Make False  
Statement to U.S.☐ Petty  
☐ Minor  
☐ Misdemeanor  
☒ Felony**PENALTY:**18 U.S.C. 1546(a): 10 years; \$250,000 fine; 3 years  
supervised release; \$100 special assessment  
18 U.S.C. 371: 5 years; \$250,000 fine; 3 years supervised  
release; \$100 special assessment**PROCEEDING**Name of Complainant Agency, or Person (& Title, if any)  
ICE☐ person is awaiting trial in another Federal or State  
Court, give name of court☐ this person/proceeding is transferred from another  
district per (circle one) FRCrP 20, 21 or 40. Show  
District☐ this is a re prosecution of  
charges previously dismissed  
which were dismissed on  
motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a  
pending case involving this same  
defendant☐ prior proceedings or appearance(s)  
before U.S. Magistrate regarding  
this defendant were recorded underSHOW  
DOCKET NO.MAGISTRATE  
CASE NO.Name and Office of Person  
Furnishing Information on  
THIS FORM**SCOTT N. SCHOOLS**☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y  
(if assigned)

Allison Marston Danner

Name of District Court, and Judge/Magistrate Location  
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

ANDREW IHENTUGE ASHIEGBU

DISTRICT COURT NUMBER

CR 07 0677

**DEFENDANT****IS NOT IN CUSTODY**

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- If answer to (6) is "Yes", show name of Institution

Has detainer  
been filed?☐ Yes  
☐ NoIf "Yes"  
give date  
filedDATE OF  
ARREST

Month/Day/Year

Or... if Arresting Agency &amp; Warrant were not

DATE TRANSFERRED  
TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☐ NO PROCESS\*☒ WARRANT Bail Amount: no bail

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\*Where defendant previously apprehended on complaint, no new summons  
or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

# United States District Court

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
CRIMINAL DIVISION  
VENUE: SAN FRANCISCO

FILED  
07 OCT 25 PM 2:07

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SI

UNITED STATES OF AMERICA,  
v.

DORIS AKUYOMA ANYANWU  
ANDREW IHENTUGE ASHIECHI

CR 07 0677

DEFENDANT.

## INDICTMENT

*ENDIC*  
A true bill.

*James Varley*  
Foreman

Filed in open court this *25* day of *Oct*

*Betty Fong*  
BETTY FONG

Clerk

EDWARD M. CHEN  
UNITED STATES MAGISTRATE JUDGE

Bail, \$

*No Bail Warrant*

SCOTT N. SCHOOLS (SCBN 9990)  
United States Attorney

FILED  
07 OCT 25 PM 2:08  
U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CR 07

0677

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
DORIS AKUYOMA ANYANWU and  
ANDREW IHENTUGE ASHIEGBU,  
Defendants.

No.

VIOLATIONS: 18 U.S.C. § 1546(a)– False  
Statement on Immigration Document  
(Counts One and Two); 18 U.S.C. § 1001-  
False Statement to an Agency of the United  
States (Count Three); 18 U.S.C. § 371 –  
Conspiracy (Count Four)

(Under Seal)

INDICTMENT

The Grand Jury charges:

COUNT ONE: 18 U.S.C. § 1546(a)– False Statement on an Immigration Document

1. On or about December 5, 2005, in the Northern District of California and  
elsewhere, the defendant

DORIS AKUYOMA ANYANWU,  
did knowingly subscribe as true a false statement with respect to a material fact in a Worksheet

INDICTMENT

1/2

for Status as a Temporary Resident under Section 245A of the Immigration and Naturalization Act, a document required by the immigration laws and regulations, in violation of Title 18, United States Code, Section 1546(a).

COUNT TWO: 18 U.S.C. § 1546(a)– False Statement on an Immigration Document

2. On or about February 2, 2006, in the Northern District of California and elsewhere, the defendant

ANDREW IHENTUGE ASHIEGBU

did knowingly subscribe as true a false statement with respect to a material fact in Declaration for CSS/LULAC Legalization and Life Act Adjustment, a document required by the immigration laws and regulations, in violation of Title 18, United States Code, Section 1546(a).

COUNT THREE: 18 U.S.C. § 1001– False Statement to an Agency of the United States

3. On or about October 3, 2006, in the Northern District of California, the defendant

DORIS AKUYOMA ANYANWU,

in matter within the jurisdiction of the United States Citizenship and Immigration Service, did knowingly and wilfully make a material false statement to the United States Citizenship and Immigration Service, an agency of the United States, by stating that she had lived with ANDREW ASHIEGBU between 1981 and 1989 in Tulsa, Oklahoma, in violation of Title 18, United States Code, Section 1001.

COUNT FOUR: 18 U.S.C. § 371 – Conspiracy to Make False Statements to an Agency of the United States

4. Beginning on a date unknown to the Grand Jury, but by no later than on or about February 2, 2006 and continuing to on or about December 6, 2006, in the Northern District of California and elsewhere, the defendants

DORIS AKUYOMA ANYANWU and  
ANDREW IHENTUGE ASHIEGBU

INDICTMENT



1 and other persons did knowingly and intentionally conspire to commit an offense against the  
2 United States, in that the defendants did knowingly and wilfully conspire to make material false  
3 statements to the United States Citizenship and Immigration Service, an agency of the United  
4 States, in violation of Title 18, United States Code, Section 1001.

5 OVERT ACTS

6 5. In furtherance of the conspiracy and to effect the objects thereof, a member of the  
7 conspiracy committed the following overt act, among others, in the Northern District of  
8 California:

9 a. On or about November 6, 2006, defendant DORIS AKUYOMA  
10 ANYANWU did knowingly and wilfully make a material false statement in a letter sent to the  
11 United States Citizenship and Immigration Service offices in San Francisco.

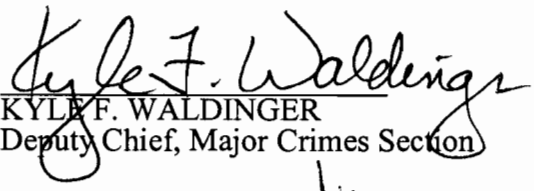
12 All in violation of Title 18, United States Code, Section 371.

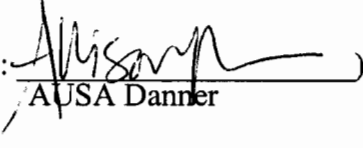
13  
14 DATED: 10-25-07

A TRUE BILL.

15  
16   
FOREPERSON

17 SCOTT N. SCHOOLS  
18 United States Attorney

19   
20 KYLE F. WALDINGER  
21 Deputy Chief, Major Crimes Section

22 (Approved as to form:   
23 AUSA Danner  
24  
25  
26  
27  
28

INDICTMENT